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April 9, 2025

**To Be Filed Under Seal**

Hon. Joan M. Azrack  
United States District Judge  
Eastern District of New York  
100 Federal Plaza  
Central Islip, NY 11722

**Re: United States v. Vladimir Antonio Arevalo-Chavez**  
**22 CR 429 (JMA)**

Dear Judge Azrack:

Counsel writes to request additional time to respond to the government's April 1, 2025 letter- motion to dismiss the above-referenced indictment "without prejudice." Counsel requests an additional two weeks until April 23, 2025 to respond. The additional time is needed because counsel has a one-week trial starting April 14, 2025; needs more time to visit his client and discuss options with him; and needs more time to do legal research, especially in light of the cases of first impression that are creating an everchanging legal landscape with new decisions being decided every day.

The government has been accommodating in helping to arrange meetings with Mr. Arevalo-Chavez.

Accordingly, counsel requests until April 23, 2025, to respond to the government's April 1, 2025 letter- motion to dismiss the above-referenced indictment.

The government does not consent to this request.

Respectfully submitted,

/S/ Louis M. Freeman  
Louis M. Freeman